

STANDARD OPERATING PROCEDURE

No. 2332.9A

**BIO-SECURITY PROCEDURES FOR CONDUCTING NPDES COMPLIANCE
EVALUATION INSPECTIONS AT ANIMAL FEEDING OPERATIONS**

March 30, 2001

By

Norman H. Crisp, ENSV/EMWC
Lorenzo Sena, ENSV/EMWC
Elizabeth J. Smith, CNSL

APPROVED: _____
Manager, Environmental Monitoring and
Water Compliance Branch

Date

Manager, Regional Quality Assurance

Date

Recertified:

Branch					
Date					

Table of Contents

Section	Page Number
	3
1.0 Purpose	
2.0 Applicability	3
3.0 Personnel Qualifications	3
4.0 Summary of Procedure	3
5.0 Definitions	4
6.0 Procedure	4
7.0 Health and Safety Warnings	6
8.0 References	6
9.0 Attachments	7
9.1 Contact Information for Region VII APHIS Area Veterinarians in Charge and State Veterinarians	8
9.2 Peer Review Clearance Form	9

1.0 **Purpose**

The purpose of this Standard Operating Procedure (SOP) is to establish uniform procedures for ensuring that bio-security is maintained at animal feeding operations during compliance evaluation inspections at Concentrated Animal Feeding Operations (CAFO's). These facilities may be subject to the requirements of National Pollution Discharge Elimination System (NPDES) established pursuant to the Clean Water Act.

2.0 **Applicability**

The procedure contained in, or referenced by, this SOP are applicable to all personnel in Region 7 of the Environmental Protection Agency (EPA), who enter CAFO's to conduct or support compliance evaluation inspections.

3.0 **Personnel Qualifications**

Personnel with the following qualifications may implement this SOP: 1) read the SOP; 2) completed Basic Inspector Training; 3) completed Basic Health and Safety Training; and 4) conducted a CAFO Compliance Evaluation Inspection under the auspices of a Senior Inspector.

4.0 **Summary of Procedures**

Compliance evaluation inspections at CAFO's will be conducted in a manner which will maintain the existing level of bio-security at the facility being inspected. This will be accomplished in three stages; pre-inspection planning, inspection procedures and post inspection activities. Additionally, inspections conducted at CAFO's will utilize the procedures specified in SOP No. 2332.1, "NPDES Compliance Evaluation Inspection" and SOP No. 2332.8, "Conducting NPDES Compliance Evaluation Inspections at Concentrated Animal (CAFO) Facilities."

Pre-inspection planning will be carried out to identify area with known reportable diseases to animal agriculture. To the extent possible these areas will be avoided. During pre-inspection planning the existing level of bio-security at the facilities to be inspected will be determined.

Inspection procedures will include those activities undertaken during the actual inspection and will include such items as complying with established and documented bio-security protocols, wearing clean uncontaminated boot covers and coveralls, and avoiding all contact with animals and production

buildings.

Post inspection procedures will include removal of boot covers and coveralls prior to exiting the facility and disinfection of equipment and vehicles driven on the facility's property.

5.0 **Definitions**

The following definitions are applicable to this SOP.

Bio-security: The practices and procedures which if implemented are likely to prevent or greatly reduce the likelihood of the spread of an infectious disease.

Disinfection: The process or procedure for killing or inactivating infectious agents.

Reportable disease: The diseases of livestock which must be reported to the state veterinarian and/or the Area Veterinarian in charge of Animal and Plant Health Inspection Services (APHIS) of the US Department of Agriculture.

6.0 **Procedures**

6.1 **Pre-inspection activities**

6.1.A. **Determination of areas with reportable diseases**

On a quarterly basis, the offices of the appropriate APHIS Area Veterinarians in Charge and the offices of the state veterinarians will be contacted by the Lead CAFO inspector to determine the counties with existing cases of reportable diseases. The address and telephone numbers of these offices are contained in Attachment 1. To the extent possible, counties with identified diseases for the specie which is to be inspected will be avoided. If it cannot be avoided, either no other facility with that species will be inspected or the facility will be the last facility inspected during the inspection trip.

6.1.B. **Advanced notification**

To the extent possible, facilities to be inspected will be contacted at least 24 hours in advance of the inspection and asked as to the existence of their documented bio-security protocol.

If the facility has documented protocol, a copy will be requested prior to the inspection. The facility will be informed that EPA has a routine bio-security protocol that will also be adhered to. If differences occur between the facilities bio-security protocol and EPA's procedures, the controlling standards will be most stringent. Standards will be interpreted separately rather than the protocol as a whole.

If the facility does not have a documented bio-security protocol, the facility will be informed that the inspector will follow the EPA bio-security procedures as detailed in this SOP. The SOP will be provided at their request.

EPA may not contact a facility prior to a site inspection due to possible instances of a history of violations or emergencies. When prior contact has not been made, inspector will follow EPA routine bio-security procedures specified in this SOP. If the facility has an established bio-security protocol it will be followed. The controlling standards are those which are most stringent, and standards will be interpreted separately rather than the protocol as a whole.

6.1.C **Similar Species -free**

Any "similar species-free" exposure procedures should be considered by the inspector and information can be acquired from the facility, appropriate state authority on animal health, or relevant federal agency in planning inspection activities.

6.2 **Inspection procedures**

On arrival at the facility, park the vehicle at the edge of the bio-security perimeter if specified in the facilities bio-security protocol. If a bio-security perimeter is not identified, stop at the first gate or the facility office. Immediately on arrival, clean unused, disposable boot covers to be placed over safety shoes and put on clean coveralls. Boot covers will be sprayed with a disinfecting solution (freshly mixed within 48 hours of use) such as Virkon S (at manufacturers recommended 1% solution) or the equivalent. Labels, MSDSs, and manufactures recommendations for use are contained in Attachment 2.

Unless required to verify conditions of the facility's permit, the inspector should not enter any production building. If entry is required the inspector will wear clean coveralls, a clean head cover, and respirator mask. On exiting from the confinement building, the inspector will change boot covers and coveralls if entry into another confinement building is required. Any more stringent standards required and document in the facility's bio-security protocol will be followed.

6.3 **Post-inspection procedures**

At the completion of the inspection, equipment utilized during the inspection such as camera, rangefinders, binoculars and pens will be wiped with a disinfectant/antimicrobial towlette (such as Vionex Antimicrobial Wipe Towlettes or the equivalent) and placed in clean containers. Field notes, forms and documents collected from the site will be sealed in clean document enclosure bags. Vehicle tires and wheel wells will be sprayed with disinfectant prior to departing the facility.

If possible, all disposable items of clothing will be disposed of at the facility where used. If on site disposal is not possible, the material will be placed in a sealed bag. Bags will not be reopened. Items which may need to be cleaned off site, such as coveralls or other clothing items, will be placed in a sealed bag for transport to the cleaning site.

Environmental samples collected on site will be placed in a container and sealed. Samples will be shipped to the laboratory as soon as possible after the inspection.

Sample handling, tracking and custody will be in accordance with SOP's 2420.4, 2420.5 and 2420.6.

7.0 **Health and Safety Considerations**

All disinfectants which may be utilized, with the exception of household bleach, will be EPA registered for that use. A copy of the label and the Material Safety Data Sheet (MSDS) will be maintained with the inspector and made available to the facility at their request. All label safety precaution will be followed and empty containers disposed of in accordance with label instructions.

8.0 **References**

EPA Region 7, Environmental Services Division. 1988. SOP No. 2332.1. "NPDES Compliance Evaluation Inspection."

EPA Region 7, Environmental Services Division. 1999. SOP No. 2332.8. “Conducting NPDES Compliance Evaluation Inspection at Concentrated Animal Feeding (CAFO) Facilities.”

EPA Region 7, Environmental Services Division. 1988. SOP No. 2420.4. “Field Chain of Custody for Environmental Samples.”

EPA Region 7, Environmental Services Division. 1988. SOP No. 2420.5. “Identification, Documentation and Tracking of Samples.”

EPA Region 7, Environmental Services Division. 1988. SOP No. 2420.6. “Sample Container Selection, Preservation and Holding Times.”

9.0 **Attachments**

9.1 Contact information for Region VII APHIS area Veterinarians in Charge and State Veterinarians

9.2 Peer Review Clearance Form

9.1 Contact information for Region VII APHIS Area Veterinarians in Charge and State Veterinarians

APHIS Area Veterinarians in Charge and State Veterinarians

	APHIS	State Veterinarians
Iowa:	Kevin Petersburg USDA Veterinary Service 210 Walnut, Room 891 Des Moines, Iowa 50309 515-284-4140	John Schiltz State Veterinarian 502 East 9 th Street Des Moines, Iowa 50319 515-281-5305
Kansas:	Kevin Varner USDA APHIS Veterinary Services 1947 NW Topeka Blvd. Suite F Topeka, Kansas 66608 785-235-2365	Lymon Kruckenberg State Veterinarian Kansas Department of Agriculture 109 SW 9 th Street Topeka, Kansas 66612
Missouri:	Robert Fischer USDA Veterinary Services P.O. Box 104418 Jefferson City, Missouri 65110 573-636-3116	John Hunt State Veterinarian P.O. Box 630 Jefferson City, Missouri 65102 573-751-3377

Nebraska: Kathleen Akin
USDA Veterinary Services
P.O. Box 81866
Lincoln, Nebraska 68501
402-434-2300

Larry Williams
State Veterinarian
P.O. Box 94787
Lincoln, Nebraska 68509
402-471-2351

